



Sterling Chemical Malta Ltd


PROCEDURE:

Enquiry / Complaint / Nonconformity Handling

REVISION HISTORY

Revision date	Revision number	Sections Affected	Change description
21.02.2014	00		First issue

Procedure number: MPA_4.5.3	Edited by: RDOC	Revision by: RSGA	Approved by: Top management
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1. PURPOSE

This procedure describes the approach for handling enquiries and complaints regarding STERLING's environmental performance, and addressing deviations from the requirements of STERLING's HSE so as to ensure a systematic process is developed to identify and address non-conformities through both corrective action and preventive action.

2. SCOPE

This procedure applies to the handling of :

- a) enquiries (both internal and external) regarding STERLING's HSE or environmental performance;
- b) complaints (both internal and external) regarding STERLING's HSE or environmental performance;
- c) nonconformities related to STERLING's HSE requirements, shall include but not be limited to below :
 - internal procedure non-compliance identified during regular monitoring / review
 - nonconformities identified in internal audits
 - nonconformities caused by suppliers / contractors / service providers


This procedure also addresses nonconformities through corrective and preventive actions so as to minimize impacts to the environment and the potential for reoccurrence.

3. REFERENCE DOCUMENTS

- UNI EN ISO 14001
- UNI ISO 14004
- Corrective Action Report (CAR) (MMA_4.5.3-A)
- CAR Status Log (MMA_4.5.3-B)
- Communication Log (MMA_4.5.3-C)

4. DEFINITIONS

RSGA	– Environmental Management Representative
RDOC	– Responsible for Documentation and Communicatio
CAR	– Corrective Action Report
HSE Committee	– Environmental Management System Committee
NC	– Nonconformity related to sterling's HSE

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5. RESPONSIBILITY

5.1 *Environmental Management Representative*

The Environmental Management Representative (EMR) shall ensure the requirements of this procedure are implemented. The EMR oversees the enquiries and complaints regarding to the EMS and controls all nonconformities in relation to the EMS implementation, ensuring the effective and appropriate corrective and preventive actions are taken to prevent NC from reoccurring.

5.2 *Function / Departmental Manager*

The Function / Departmental Manager shall maintain the communication log (EF-EP07-03), handle enquiries / complaints / NC, investigate the causes or potential causes of NC, verify the implementation of appropriate corrective and preventive actions and maintain relevant records.

5.3 *Staff of Sterling Chemical Malta Ltd*

Staff of Sterling chemical Malta Ltd shall report any enquiries / complaint / NC to their supervisor and implement corrective and/or preventive actions as instructed by the relevant Function / Departmental Manager.

6. PROCEDURE

6.1 Handling Enquiries / Complaints

6.1.1 All staff shall report any enquiries / complaint / NC (both internal and external) to their supervisors and such enquiries / complaint / NC shall be recorded and tracked in the log sheet maintained by the Function / Departmental Manager.

6.1.2 To handle complaints, the responsible personnel shall consult the RSGA to determine the appropriate corrective and preventive actions and to ensure the actions are implemented effectively to rectify the problem.


6.2 Handling NC Identified Internally

6.2.1 Who ever raises an NC shall initiate a CAR by completing Section 1 & 2 of the **CAR Form** (as shown in Appendix 1) for endorsement by the respective Function / Departmental Manager. The RSGA or RDOC shall be responsible to monitor the CAR status and maintain the log (Appendix 2).

6.2.2 The CAR recipient, upon consultation with the RSGA or RDOC shall investigate the root causes of NC and complete the CAR.

6.2.3 Any changes of the HSE documentation as required by the CAR shall be reflected through amending respective procedures or instructions. The RSGA or RDOC shall ensure that these changes are communicated to all relevant staff.

6.2.4 The CAR form archives at the HSE office, in paper and electronic form. The path of the survey is entered in the register of non-compliance and accidents and corrective and

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preventive actions for the environment (MRA_4.5.3-C);

6.3 Review by HSE committee

6.3.1 HSE Committee will review and discuss any significant issues regarding the enquiry / complaint / CAR / nonconformities identified, and determine any preventive actions shall be taken for continual improvement of the HSE and environmental performance of Sterling Chemical Malta Ltd.

6.3.2 The effectiveness of corrective and preventive actions taken shall be reviewed.

7. RECORDS


Record Description	Record Location/ Retention Responsibility	Minimum Retention Time
CAR forms (MMA_4.5.3-A)	RSGA-RDOC/ Function / Departmental Manager	3 years
CAR Status Log (MMA_4.5.3-B)	RSGA	3 years
Communication Log (MMA_4.5.3-C)	RSGA - RDOC/ Function / Departmental Manager	3 years
Enquiry / Complaint Log and Correspondences	RSGA-RDOC / Function / Departmental Manager	3 years

8. APPENDIX

Appendix 1 : Corrective Action Report (CAR) (MMA_4.5.3-A)

Appendix 2 : CAR Status Log (MMA_4.5.3-B)

Appendix 3 : Communication Log (MMA_4.5.3-C)

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Section 1 : General Information			
Department / Function concerned :		CAR No:	
ISO 14001 clause Reference :		Reference Procedure :	
Initiator / Auditor :		Auditee (if applicable) :	
Section 2 : Non conformity Details			
Details <i>(include where in the organisation the finding was identified)</i>			
Initiator / Auditor :	(Signature)	Responsible Dept / Function Manager:	(Signature)
Section 3 : Root Cause			
Details			
Section 4 : Corrective Action			
Details of proposed action:			
Actions to be taken by:		Date of action to be completed:	
Section 5 : Preventive Action			
Details of proposed action:			
Actions to be taken by:		Date of action to be completed:	
Responsible Dept / Function Manager:		Date :	
Section 6 : Verification and Close Out			
Verification details:			
Verified by :		(Signature)	Date:



FORM

Form number:
MMA 4.5.3-B

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CAR STATUS LOG

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¹ CAR raised from : Internal Audit (IA) / Complaint (C) / Regular Monitoring (M) / Management Review (MR) / others as specify

